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February 23, 2010

Ms. Carolyn d'Almeida
Environmental Protection Agency, Region 9
Superfund Division
75 Hawthorne Street, SFD-7-1
San Francisco, California 94105

**Re: Request for Clarification of Comments**
**Draft DNAPL Feasibility Study**
**Montrose Superfund Site**
**20201 S. Normandie Avenue, Los Angeles, California**

Dear Ms. d'Almeida:

On behalf of Montrose Chemical Corporation of California (Montrose), AECOM requests clarification of comments regarding the *Draft Dense Non-Aqueous Phase Liquid (DNAPL) Feasibility Study (FS)* for the Montrose Superfund Site. EPA commented on the draft DNAPL FS in a letter dated January 27, 2010, and Montrose is evaluating the comments. To assist in evaluating these comments, we request clarification as follows:

- General Comment No. 10: EPA indicated that Alternative 5a (steam injection over focused treatment area) "*will remove 144,000 to 230,000 lbs of MCB (50 to 79 percent of the entire MCB mass)*". Please provide calculations to support this estimated range of MCB mass removal by steam injection.

- Specific Comment No. 4: EPA has estimated a DNAPL mass of 582,000 pounds using an alternate approach, including 80,000 pounds of mobile DNAPL. The comment indicates that "*EPA will provide Montrose with the basis for the calculations*". Please provide the calculations so that we may better understand EPA's development of these alternate mass estimates.

- Specific Comment No. 9: EPA has estimated an MCB mass of 245,000 pounds in the focused treatment area (presumably 490,000 pounds of DNAPL). Please provide the calculations supporting the mass estimate within the focused treatment area. Please also confirm whether the focused treatment area assumed by EPA in these calculations differs in any respect from the 26,000 square foot area shown in Figure 5.11 of the draft DNAPL FS.

- Specific Comment No. 9: EPA indicated a MCB mass removal efficiency up to 94% by steam injection based on an assumed residual MCB saturation of 0.5%. Please provide the basis and supporting calculation for the 0.5% residual MCB saturation.

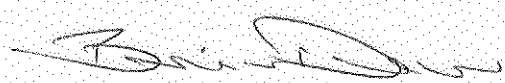
- Specific Comment No. 81: EPA indicated that "*there may be 10,000 lbs of MCB already in the Bellflower Sand*". Please provide calculations to support this MCB mass estimate.

- Specific Comment No. 131: EPA indicated that steam injection over the entire DNAPL-impacted area would remove 143,000 to 262,000 pounds of MCB, representing 49 to 90 percent of the MCB mass. Please provide the calculations supporting these mass removal estimates.

If you have any questions regarding this request for clarification, please contact me at (562) 213-4141.

Sincerely,

**AECOM**



Brian Dean
Senior Program Director

cc: Ms. Claire Trombadore – EPA
Mr. Safouh Sayed - DTSC
Ms. Natasha Raykhman - CH2M Hill
Mr. Joe Kelly - Montrose Chemical Corp.
Mr. Karl Lytz - Latham & Watkins
Mr. Kelly Richardson - Latham & Watkins
Mr. Paul Sundberg
Mr. Mike Palmer - de maximis